

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD INVESTMENT FINANCIAL
SERVICES, LLC,

Defendant.

Civil No. 1:11-cv-01083-RMB-KMW

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

Civil No. 1:14-cv-01611-RMB-KMW

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING CONSOLIDATION
OF DISCOVERY**

WHEREAS on November 14, 2011, Plaintiffs Jennifer Kasilag, Louis Mellinger, Judith Menendez, Jacqueline Robinson, Linda Russell, and Dennis Russell (collectively, the “*Kasilag I* Plaintiffs”) filed a Second Amended Complaint in the action captioned *Kasilag, et al., v. Hartford Investment Financial Services, LLC*, No. 1:11-cv-01083-RMB-KMW (“*Kasilag I*”) asserting claims against Defendant Hartford Investment Financial Services, LLC (“HIFSCO”) on behalf of the Hartford Healthcare Fund (f/k/a the Hartford Global Health Fund), the Hartford Conservative Allocation Fund, the Hartford Growth Opportunities Fund, the Hartford Inflation

Plus Fund, the Hartford Balanced Fund (f/k/a the Hartford Advisers Fund), and the Hartford Capital Appreciation Fund (collectively, the “*Kasilag I* Funds”);

WHEREAS depositions in *Kasilag I* have not yet commenced, and document discovery is ongoing;

WHEREAS Hartford Funds Management Company, LLC (“HFMC”) replaced HIFSCO as the *Kasilag I* Funds’ investment adviser effective January 1, 2013 (HIFSCO and HFMC are hereinafter collectively referred to as “Defendants”);

WHEREAS on March 12, 2014, the *Kasilag I* Plaintiffs, along with one additional plaintiff Darin Dudek (together, “Plaintiffs”), filed a new action captioned *Kasilag, et al. v. Hartford Funds Management Company, LLC*, No. 1:14-cv-01611-RMB-KMW (“*Kasilag II*”) against HFMC on behalf of the *Kasilag I* Funds and two additional funds, the Hartford Floating Rate Fund and the Hartford Small Company Fund (collectively, the “Additional Funds,” and together with the *Kasilag I* Funds, the “Funds”);

WHEREAS *Kasilag II* challenges the same basic underlying conduct as *Kasilag I*, although against a different Defendant and for a different time period with respect to the two Additional Funds;

WHEREAS the parties expect that pretrial discovery in *Kasilag II* will involve depositions of many of the same witnesses and production of many of the same documents as in *Kasilag I*;

WHEREAS for efficiency reasons and to prevent unnecessary duplication, the parties believe that pretrial discovery in *Kasilag I* and *Kasilag II* should be coordinated;

WHEREAS the parties do not expect such coordination to result in delays in *Kasilag I* or *Kasilag II*, and propose that *Kasilag II* proceed on the same schedule as *Kasilag I*; and

WHEREAS the parties attended an in-person status conference before Magistrate Judge Karen M. Williams on March 13, 2014, during which coordination of *Kasilag I* and *Kasilag II* was discussed;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the parties through their respective counsel and subject to the Court's approval that:

1. *Kasilag I* and *Kasilag II* are consolidated solely for purposes of pretrial discovery pursuant to Fed. R. Civ. P. 42 and L. Civ. R. 42.1. *Kasilag II* shall proceed on the same pretrial discovery schedule set forth in the Scheduling Order entered in *Kasilag I* on June 28, 2013 (Dkt. No. 56).

2. Defendant HMFC shall have until April 2, 2014, twenty-one days from the date of the filing of the Complaint in *Kasilag II*, to serve an answer to the complaint in *Kasilag II*.

3. Other than (1) Defendant's filing of its answer as set forth in Paragraph 2 above, and (2) pretrial discovery, which shall proceed on the same track as *Kasilag I* as set forth in Paragraph 1 above, *Kasilag II* is stayed until further order of the Court.

Dated: March 14, 2014

Respectfully submitted,

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IT IS SO ORDERED.

Dated: March __, 2014

THE HONORABLE RENEE MARIE BUMB
UNITED STATES DISTRICT JUDGE